Attorney for Debtor Pia J. North, Esq. #29672 North Law 5913 Harbour Park Drive Midlothian, VA 23112 Tel: (804) 739-3700 Fax: 739-2550

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

In Re: Anita J. White-Woodley
Case No. 14-33677
12412 Swift Crossing Drive
Trustee: Suzanne E. Wade

Midlothian, VA 23112 Chapter: 13

Last four digits of SSN: xxx-xx-2108

MOTION TO SHORTEN NOTICE PERIOD And EXPEDITE HEARING for Motion to Incur Debt to purchase an automobile

Comes Now, Debtor, Anita J. White-Woodley, by counsel and moves this Court pursuant to Local Rule 9013-1 (N) to set a hearing on the Debtor's Motion to Incur Debt to purchase an automobile for a hearing as soon as practical and Motion to Shorten the Notice Period in this matter. In support of this Motion the Debtor states as follows:

- 1. Debtor filed a Chapter 13 bankruptcy on July 9, 2014. The Debtor filed a Motion to Incur Debt to purchase an automobile.
- 2. An emergency exists in that the debtor was in an automobile accident and her former vehicle is a total loss. The insurance company approved an automobile rental until January 22, 2017.
- 3. The Debtor may suffer irreparable harm if her counsel is not present at this hearing.

WHEREFORE, Debtor requests that the Court shorten the notice period on the Debtor's Motion to Incur Debt to purchase an automobile to not less than two days prior to the hearing to be set by the Court in this matter, and for any and all other relief just and proper.

Anita J. White-Woodley

By: /s/ Pia J. North Counsel

Certification

- I, Pia J. North certify that I am the attorney for the Debtor and further that I have:
- (1) Carefully examined the matter and concluded that there is a true need for an emergency hearing,
- (2) Not created the emergency through any lack of due diligence, and
- (3) Have made a *bona fide* effort to resolve the matter without a hearing. (There is no way to resolve this issue without an Order from the Court)

/s/ <u>Pia J. North</u> Pia J. North, Esquire Case 14-33677-KLP Doc 38 Filed 01/23/17 Entered 01/23/17 22:31:25 Desc Main Document Page 2 of 6

Attorney for Debtor Pia J. North, Esq. #29672 North Law 5913 Harbour Park Drive Midlothian, VA 23112 Tel: (804) 739-3700

Fax: 739-2550

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

In Re: Anita J. White-Woodley Case No. 14-33677

12412 Swift Crossing Drive Trustee: Suzanne E. Wade

Midlothian, VA 23112 Chapter: 13

Last four digits of SSN: xxx-xx-2108

NOTICE OF MOTION TO SHORTEN NOTICE PERIOD And EXPEDITE HEARING

Counsel for Anita J. White-Woodley, Debtor filed papers with the court to Shorten the Notice Period on the Debtor's Motion to Incur Debt to purchase an automobile.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion then you or your attorney must file with the court, at the address shown below, a written request for a hearing or a written response pursuant to Local Bankruptcy Rule 9013-1 (H). If you mail your request for hearing or response to the court for filing, you must mail it early enough so the court will receive it at least two (2) days prior to the hearing on the Motion to Shorten Notice Period and Expedite hearing that will be set by the Court in this matter, at the United States Bankruptcy Court, 701 E. Broad Street, Suite 4000, Richmond, Virginia, Richmond, VA 23219.

You must also mail a copy to:

Pia J. North Suzanne E. Wade North Law P.O. Box 1780

5913 Harbour Park Drive Richmond, VA 23218-1780

Midlothian, VA 23112

NOTICE IS HEREBY GIVEN PURSUANT TO LOCAL RULE 9013-1, UNLESS A WRITTEN RESPONSE TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY NOT LESS THAN 2 (TWO) DAYS PRIOR TO THE HEARING ON THE MOTION TO INCUR DEBT TO PURCHASE AN AUTOMOBILE, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND ISSUE AN ORDER SUSTAINING THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Anita J. White-Woodley

BY: /s/ Pia J. North

Counsel

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Attorney for Debtor Pia J. North, Esq. #\$29672 North Law 5913 Harbour Park Drive Midlothian, VA 23112 (804) 739-3700

United States Bankruptcy Court Eastern District of Virginia Richmond Division

In Re: Anita J. White-Woodley Case No. 14-33677

12412 Swift Crossing Drive Trustee: Suzanne E. Wade

Midlothian, VA 23112 Chapter: 13

Last four digits of SSN: xxx-xx-2108

NOTICE of HEARING

PLEASE TAKE NOTICE that on <u>January 25, 2017 @ 10:00 a.m.</u> or as soon thereafter as is practical, we will appear before the Honorable Keith L. Phillips at the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division, 701 E. Broad Street, Room 5100, Richmond, VA 23219 on the Debtor's MOTION TO SHORTEN NOTICE PERIOD And EXPEDITE HEARING.

Anita J. White-Woodley

BY: /s/ Pia J. North Counsel

Certificate of Service

I hereby certify that I have on January 23, 2017, served by transmitting a true copy of the foregoing Motion to Shorten Notice Period, Expedite hearing and Motion to Incur Debt to purchase an automobile, Notice of Motion and Notice of Hearing electronically through the Court's CM/ECF system or by first class mail, postage pre-paid to: Anita J. White-Woodley, the Debtor, the Trustee, the United States trustee and to all creditors and parties in interest on the attached mailing matrix.

By: <u>/s/ Pia J. North</u> Counsel Case 14-33677-KLP Case 14-33677-KLP

Eastern District of Virginia Richmond

Mon Jan 23 22:00:19 EST 2017

NCEP, LLC by AIS Data Services, LP as agent

PO Box 165028

Irving, TX 75016-5028

United States Bankruptcy Court 701 East Broad Street Richmond, VA 23219-1888

American InfoSource LP as agent for

Allied Cash Advance PO Box 248838

Oklahoma City, OK 73124-8838

CJW Center P.O. Box 740760

Cincinnati, OH 45274-0760

(p)CAPITAL ONE PO BOX 30285

SALT LAKE CITY UT 84130-0285

Check City 2729-B West Broad Street

Richmond, VA 23220-1905

Commonwealth Lab Consultants

PO Box 36559

Richmond, VA 23235-8011

Farmer's Insurance 5048 US Hwy 29 Blairs, VA 24527-2418

Fredericksburg Cr Bur 10506 Wakeman Dr Fredericksburg, VA 22407-8040 Doc 38 Filed 01/23/17 Entered 01/23/17 22:31:25 MAC X POT CITY HE THE " Page 4 of 6

> 3476 Stateview Blvd. Fort Mill, SC 29715-7203

The Bank of New York Mellon Trust Company, N

236 Clearfield Ave., Suite 215 Virginia Beach, VA 23462-1893

Allied Title Lending LLC 7955 NW 12th St

Ste 300

Miami, FL 33126-1823

Americas Servicing Co

Po Box 10328

Des Moines, IA 50306-0328

CJW Medical Center P.O. Box 13620

Richmond, VA 23225-8620

Capio Partners Llc 2222 Texoma Pkwy Ste 150

Sherman, TX 75090-2481

Check City 3920 Hull St

Richmond, VA 23224-1714

Commonwealth of VA-Tax

P.O. Box 2156

Richmond, VA 23218-2156

First Virginia Financial 9121 Staples Mills Road Henrico, VA 23228-2026

Fredericksburg Credit Bureau Inc 10506 Wakeman Drive Fredericksburg, VA 22407-8040

Wells Fargo Bank, N.A./Wells Fargo Home Mort

Desc Main

MAC X7801-014 3476 Stateview Blvd. Fort Mill, SC 29715-7203

P.O. Box 165028

Irving, TX 75016-5028

America's Servicing Company Attn: Bankruptcy Department 3476 Stateview Blvd. MAC# D3347-014

Fort Mill, South Carolina 29715-7203

Anesthesia Assoc of Richmond

PO Box 17978

Richmond, VA 23226-7978

Cac Financial Corp 2601 Nw Expwy

Oklahoma City, OK 73112-7236

Charlottesville Bureau 3690 Dobleann Dr

Charlottesville, VA 22911-9088

Check Into Cash 1912 Boulevard

Colonial Heights, VA 23834-2327

Credit Adjustment Board, Inc

306 East Grace St

Richmond, VA 23219-1795

(p)FOCUSED RECOVERY SOLUTIONS 9701 METROPOLITAN COURT

STE B

RICHMOND VA 23236-3690

Henrico Doctors Hospital P. O. Box 740760 Cincinnati, OH 45274-0760 (p)INTERNAL REVENUE SERVICE 33677-KLP Doc 38 Filed 01/23/17 CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346

PHILADELPHIA PA 19101-7346

Lab Corp P.O. Box 2240

Burlington, NC 27216-2240

NCB Management PO Box 1099

Langhorne, PA 19047-6099

North & Associates, P.C. 5913 Harbour Park Drive Midlothian, VA 23112-2163

Quest Diagnostics PO Box 740880 Cincinnati, OH 45274-0880

Real Time Resolutions, Inc as Agent for ALLIED CASH ADVANCE PO Box 566027 Dallas, TX 75356-6027

SLS 8742 Lucent Blvd.#300 Highlands Ranch, CO 80129-2386

Santander Consumer Usa Po Box 961245 Ft Worth, TX 76161-0244

Specialized Loan Servicing LLC 8742 Lucent Blvd Suite 300 Highlands Ranch, CO 80129-2386

USA Recovery Solutions 4950 Hillsdale Circle El Dorado Hills, CA 95762-5714

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P O Box 7346 Philadelphia, PA 19101-7346

Law Office Chaplin & Gonet 5211 West Broad St, Ste 100 Richmond, VA 23230-3000

NCEP, LLC by AIS Data Services, LP as agent PO Box 4138

Houston, TX 77210-4138

Ob-Gyn Specialists of Richmond 3 Maryland Farms Suite 250 Brentwood, TN 37027-5053

Radiology Assc of Richmond 2602 Buford Road Richmond, VA 23235-3422

Rehab Plus Associates 11521 Robious Road Midlothian, VA 23113

Santander Consumer USA P.O. Box 560284 Dallas, TX 75356-0284

Shapiro Brown & Alt LLP 236 Clearfield Avenue, # 215 Virginia Beach, VA 23462-1893

(p)SPRINGLEAF FINANCIAL SERVICES P O BOX 3251 EVANSVILLE IN 47731-3251

Uncle Bob's Storage 3830 N. Bailey Bridge Road Midlothian, VA 23112-2912

Midnight Express Auto Recovery PO Box 3351

Philadelphia, PA 19101-7346

P.O. Box 7346

NCO 2360 Campbell Creek Ste 500 Richardson, TX 75082-4453

Stafford, VA 22555-3351

Pest Masters Termite & Pest C 6525 Dickens Place Richmond, VA 23230-2001

Radiology Assoc of Richmond 2602 Buford Road Richmond, VA 23235-3422

Retrieval Masters Creditors Bu 4 Westchester Plaza Ste 110 Elmsford, NY 10523-1616

Santander Consumer USA Inc.; as Assignee for HSBC P.O. Box 961245 Fort Worth, TX 76161-0244

Sound and Spirit P.O. Box 1958 Indianapolis, IN 46291-0001

Trident Asset Manageme 53 Perimeter Ctr E Ste 4 Atlanta, GA 30346-2287

VCU Ortho 520 N 12th St # 222 Richmond, VA 23298-5064 Virginia Emergency Phy 14-33677-KLP Doc 38 Ani 75 Remittance Drive 124 Suite 1151 Mid Chicago, IL 60675-1151

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Anita F. White woodley Page 6 of 6
North Law
Midlothian, VA 23112-3144

S913 Harbour

North Law 5913 Harbour Park Drive Midlothian, VA 23112-2163

Desc Main

Suzanne E. Wade P.O. Box 1780 Richmond, VA 23218-1780

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Cap One Po Box 85520 Richmond, VA 23285

Focus Recry 9701 Metropolitan Suite B Richmond, VA 23236 IRS P.O. Box 21126 Philadelphia, PA 19114

Springleaf Financial 9925 Hull Street Rd North Chesterfield, VA 23236

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)NCEP, LLC P.O. Box 165028 Irving, TX 75016-5028 End of Label Matrix
Mailable recipients 63
Bypassed recipients 1
Total 64